

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MINNESOTA**

DEUTSCHE BANK TRUST COMPANY	:	Court File No. 11-cv-1452 (MJD/AJB)
AMERICAS, in its capacity as successor	:	
indenture trustee for certain series of Senior	:	
Notes, et. al.,	:	
	:	
Plaintiffs,	:	<u>NOTICE OF PLAINTIFFS'</u>
	:	<u>SECOND AMENDED MOTION</u>
vs.	:	<u>TO STAY</u>
	:	
U.S. BANK, N.A.,	:	
	:	
Defendant.	:	

**NOTICE OF PLAINTIFFS' SECOND AMENDED MOTION TO STAY
DEFENDANT'S TIME TO ANSWER OR OTHERWISE RESPOND
TO THE COMPLAINT IN THIS ACTION**

TO: DEFENDANT ABOVE-NAMED AND ITS ATTORNEYS.

PLEASE TAKE NOTICE that Plaintiffs bring this Second Amended Motion to Stay Defendant's Time to Answer or Otherwise Respond to the Complaint in this Action before the Honorable Arthur J. Boylan, Chief Magistrate Judge of the United States District Court, District of Minnesota, Courtroom 9E, United States Courthouse, 300 South Fourth Street, Minneapolis, Minnesota, 55415 for an Order staying this action pursuant to Orders of the United States Bankruptcy Court for the District of Delaware in *In re Tribune Company, et al.*, Case No. 08-13141 (KJC) dated April 25, 2011 (Dkt. No. 8740) ("SLCFC Order") and May 19, 2011 (Dkt. No. 8949) ("Protective Order"), Federal Rules of Civil Procedure 26(b) and (d) and Local Rule 16.1, and the Court's inherent

authority to manage its docket. In support of the motion, Plaintiffs submit their Second Amended Motion to Stay and a Revised Proposed Order, and rely on their previously filed Memorandum of Law, Declaration and Exhibits. Any party named in this action may file a response to this motion and/or request for a hearing no later than 5 pm, July 28, 2011. Unless the Court determines otherwise, the Second Amended Motion to Stay will be decided on the motion papers without a hearing.

Dated this 21st day of July, 2011.

KELLEY, WOLTER & SCOTT, P.A.

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